

September 11, 2026

Mr. Brad Davison, Environmental Specialist
Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321



RE: Response to IDNR Letter Dated July 14, 2026 (Doc #117567)
Grundy County Sanitary Landfill
IDNR Permit No. 38-SDP-01-75C

Dear Mr. Davison:

This letter is being submitted in response to the IDNR letter dated July 14, 2026 (Doc #117567) and presents the plan and schedule to address the vegetation bare spots located in isolated areas of the landfill cap (Figure 1). The planned actions are intended to address the last remaining item before the IDNR and the Grundy County Landfill Commission (GCLC) enter negotiation of an Environmental Covenant.

Gas Venting

Approximately eighteen (18) gas vents will be drilled at select locations on the cap in the proximity of bare areas and stressed vegetation. The vents will be constructed by drilling an 8.25-inch diameter hole to a depth of approximately 11 feet below grade. The drilled hole will then have 2.0-inch PVC screen and pipe installed as illustrated on the attached detail (Figure 2). The annular space between the PVC and the drilled hole will be backfilled with pea gravel and sealed with bentonite clay chips. The integrity of the landfill cap will be maintained using the bentonite and the vegetative topsoil.

The vents are intended to facilitate the movement of landfill gas through the vents, rather than through the vegetative soil layer of the cap. The absence of landfill gas in cap soils should facilitate improvement in the vegetative growth layer.

Soil Stabilization

The areas of bare soil do not currently demonstrate evidence of significant wind or water erosion. However, several of the bare and stressed areas of vegetation are situated on sloped segments of the landfill cap and are likely vulnerable to erosion under certain conditions or events. It is deemed prudent to place rock pavements over the bare and stressed vegetation areas to further protect the integrity of these vulnerable areas of the landfill cap.

Limestone rock (3-inch clean) will be transported to the landfill and will be placed over the bare soil areas as 6-inch to 8-inch-thick pavements. The bare soil will not be removed but will be smoothed and prepared prior to the addition of the rock pavements. Fabric will not be placed under the rock pavements. The lack of fabric will promote the growth of vegetation within and through the rock pavements as gas venting improves the vegetative health and soil conditions in these areas.

Schedule

The GCLC entered into an agreement with a drilling contractor yesterday September 10, 2026. The vent construction is anticipated to be completed by the end of November 2026.

Upon completion of the vent construction, the placement of the gravel pavements will commence. It is anticipated that all planned actions related to the vents and the gravel pavements will be completed prior to April 30, 2027.

Site Visit

Upon completion of the planned vent construction and placement of the gravel pavements, GCLC will contact the IDNR. The intent of the contact will be to notify the IDNR that the work is complete and to invite IDNR staff to visit the site. The GCLC intends that the IDNR site visit will initiate the start of the Environmental Covenant process.

Other Considerations

It is requested that the permit compliance activities at the site (engineering inspections, water sampling, gas monitoring, leachate level monitoring, and all reporting) be suspended for the remainder of 2026 and the first one-half of calendar year 2027. Suspension of the permit compliance activities will help GCLC offset the cost of vent construction and gravel pavement placements at the landfill. The goal of the GCLC is to have an Environmental Covenant completed and filed prior to June 30, 2027. Temporary suspension of the permit compliance activities will be a financial incentive to complete the vent construction, the gravel pavement placement, and the Environmental Covenant in a timely manner.

Please let me know if you agree with the planned activities and the request for a future IDNR site visit. Also, please confirm whether the temporary suspension of the permit compliance activities will be granted.

Respectfully Submitted,
HLW Engineering Group



Todd Whipple, CPG
Project Manager

cc: Karl Strohbehn, Chair, Grundy County Landfill Commission
Kevin Nederhoff, Secretary, Grundy County Landfill Commission
Jeff Pabst, Grundy County Board of Supervisors
Chad Brown, Manager, Grundy County Landfill

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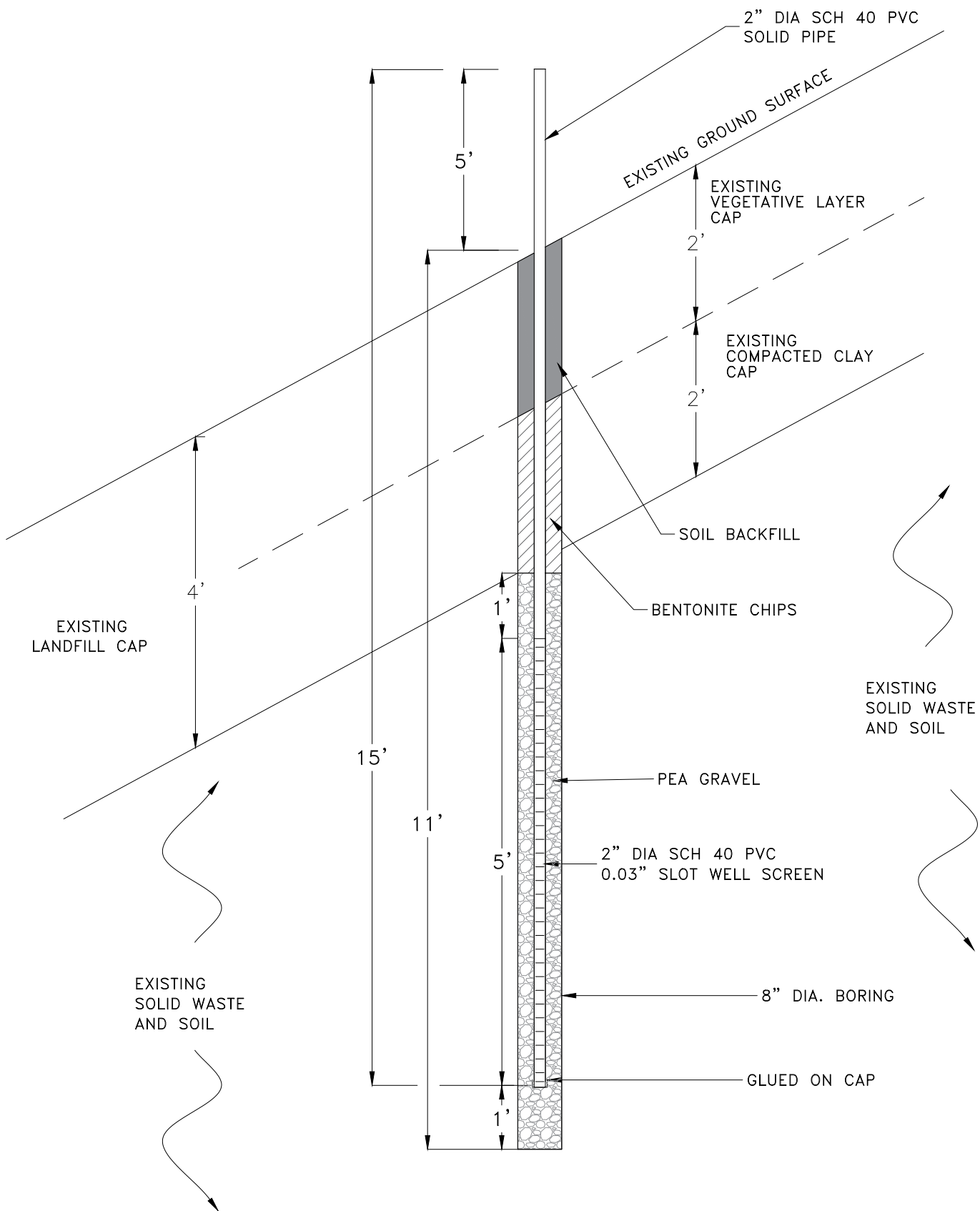
SURVEY DATE: AUG 27, 2008



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SITE PLAN
CAP STABILITY PROJECT
GRUNDY COUNTY SANITARY LANDFILL
GRUNDY CENTER, IOWA

FIGURE: 1		
REVISION	NO.	DATE
DRAWN JGH	PROJECT NO. 6033-26A	DATE 7/23/26



HLW Engineering Group

PASSIVE GAS VENT

GRUNDY COUNTY SANITARY LANDFILL
GRUNDY CENTER, IOWA

FIGURE: 2

REVISION	NO.	DATE
DRAWN JGH	PROJECT NO. 6033-26A	DATE 8/14/26